

June 27, 2025

Reply to: Main Office

Aaron J. Hayes (803) 256-2233 ajh@swblaw.com

VIA E-MAIL: Michael.Guzman@lytx.com

Michael Guzman Legal Specialist, II Lytx, Inc.

RE:

Steven Grinnell, et al v. Roehl Transport, Inc. and Tovarrian Bradford Russell

Civil Action No.:

2:23-cv-6131-RMG

Our File:

3241-14533

Dear Mr. Guzman:

I hope this letter finds you well. I am in receipt of your letter dated June 20, 2025, which I received on June 24, 2025. Please allow this letter to serve as a follow-up, concerning my impressions of nature and intent of the court order I sent to you in my previous correspondence dated June 18, 2025.

Regarding the in-cab recording capabilities of the video event recorded installed on the subject unit, I appreciate the explanation provided in your June 20, 2025 letter. As such, it is my understanding that Lytx is not in possession of any in-cab video related to the date, time, location, and Roehl unit in question.

Regarding the issue of the service agreement that existed between Roehl Transport, Inc. and Lytx in March of 2023, I understand that Lytx considers this material to be "confidential and proprietary, containing competitively sensitive information." In answer to your specific question, I can state that there is no confidentiality order in this case, but please be advised that it is my understanding that the court order requires production of this agreement to the court for *in camera* review. There has not yet been any order that it be produced to the other litigants in this action. It is my request that you produce the service agreement to me, and I will produce to the court for *in camera* inspection. Should the court require the service agreement to be produced to the other litigants, we will request permission to redact and/or the entry of a confidentiality order. Hopefully this assuages the concerns stated in your June 20, 2025 letter.

Upon your receipt and review of this correspondence, please forward the remaining information to me. As always, do not hesitate to contact me directly if you have any further questions or concerns.

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Sincerely,

SWEENY, WINGATE & BARROW, P.A.

Aaron J. Hayes

AJH/tnn

cc (via email): Cooper Klaasmayer, Esq. Lauren Carroway, Esq. Mark S. Barrow, Esq. Jake M. Tillery, Esq.